

FIRST JUDICIAL DISTRICT COURT
STATE OF NEW MEXICO
COUNTY OF SANTA FE

NO. D-101-CV-2015-00002

CLIFFORD ACUNA,
Plaintiff,

Vs

CORIZON HEALTH, INC.,
Defendant.

COMPLAINT FOR DAMAGES FROM MEDICAL MALPRACTICE

COMES NOW, Plaintiff, **CLIFFORD ACUNA**, by and through his attorney, John P Faure, and for his Cause of action, states:

1. The Plaintiff, **CLIFFORD ACUNA**, is a resident of Santa Fe County, State of New Mexico.
2. The Defendant, **CORIZON HEALTH, INC.**, is a corporation authorized to do business in the State of New Mexico.
3. At all relevant times, Defendant, **CORIZON HEALTH, INC.**, provided medical care and treatment at Southern New Mexico Correctional Facility and acted through its employees.
4. On or about December 29, 2011, Plaintiff ruptured his Achilles tendon while incarcerated at Southern New Mexico Correctional Facility. Plaintiff reported his injury and complaints to the Defendant, but they were negligent in treating and failing to treat the Plaintiff, **CLIFFORD ACUNA**.
5. The Defendant, **CORIZON HEALTH, INC.**'s negligence includes, but it is not limited to, failure to properly diagnose, treat, advise and care for the Plaintiff, **CLIFFORD ACUNA**, failure to xray or otherwise examine Plaintiff, **CLIFFORD ACUNA**, and failure to promptly refer Plaintiff, **CLIFFORD ACUNA** for orthopedic treatment.
6. As a proximate result of the negligence of the Defendant, **CORIZON HEALTH, INC.**,

Plaintiff, **CLIFFORD ACUNA**, sustained damages which include, but are not limited to, past and future pain and suffering, past and future medical bills, loss of enjoyment of various aspects of life, loss of earning capacity, and permanent impairment.

WHEREFORE, Plaintiff, **CLIFFORD ACUNA**, respectfully requests judgment against the Defendant, **CORIZON HEALTH, INC.**, for a reasonable award of damages, for his costs herein and for such other relief as the Court deems proper.

RESPECTFULLY SUBMITTED,



JOHN P FAURE
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